

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WFMC 2016-LC25 West Bay Area
Boulevard, LLC,

Plaintiff

- against -

Cheryl Tyler,

Defendant.

Case No. 1:21-cv-08865

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Defendant Cheryl Tyler, by and through her attorneys Parkins Lee & Rubio LLP, hereby moves this Court, before the Honorable Vernon S. Broderick, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, for an Order pursuant to Rule 12(b)(2) of the Federal Rules of Procedure, dismissing the Complaint of Plaintiff WFMC 2016-LC25 West Bay Area Boulevard, LLC in its entirety, and granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 6.1(c) of the Local Civil Rules of the Southern District of New York by the Judge's Individual Practice, the parties and their attorneys shall only appear to argue the motion if directed by the Court by order.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, should be filed in accordance with the briefing schedule set by the Court or, in the absence of a specific order, pursuant to Rule 6.1(b) of the Local Civil Rules of the Southern District of New York.

Dated: November 23, 2021

PARKINS LEE & RUBIO LLP

/s/ Charles M. Rubio

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To: Attorneys for Plaintiff (via ECF)